

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

SYLVESTER BRINSON,	)	
	)	
Plaintiff,	)	No.08-C-50070
	)	
v.	)	Judge Frederick J. Kapala
	)	Judge P. Michael Mahoney
DR. ANTREAS MESROBIAN, et al.,	)	
	)	
Defendants.	)	

**MOTION OF DR. ANTREAS MESROBIAN AND DR. PATRICIA VICKROY  
FOR AN EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, DR. ANTREAS MESROBIAN and DR. PATRICIA VICKROY, by their attorneys, CHARYSH & SCHROEDER, LTD., pursuant to FRCP 6(b), for their Motion For An Extension Of Time To Respond To Plaintiff's Complaint, state as follows:

1. These defendants have previously signed waivers of service which require them to respond to plaintiff's complaint by September 2, 2008.
2. Counsel for these defendants was only recently retained, and requires additional time to review plaintiff's complaint, and review and investigate the facts of the case, in order to properly respond on behalf of said defendants.
3. Additionally, counsel for these defendants anticipates representing additional named defendants in this matter, once they have been properly served or have signed waivers of service, and counsel will need time to determine if any conflicts exist concerning their representation.

4. A review of the docket in this matter indicates that counsel has been appointed on behalf of the plaintiff, and that plaintiff's appointed counsel is to file an amended complaint on or before October 8, 2008. The Court has also extended time for service under Rule 4, to October 8, 2008.

5. The filing of a single responsive pleading to plaintiff's anticipated amended complaint, on behalf of all defendants represented by these defendants' counsel, will promote judicial economy, and avoid piece-meal pleading in this litigation.

6. This motion is made in good faith, and not for the purpose of undue delay; and plaintiff will not be prejudiced by the granting of this motion, as not all defendants have yet been served.

WHEREFORE, defendants, DR. ANTREAS MESROBIAN and DR. PATRICIA VICKROY, respectfully request that this Honorable Court enter an order granting them an extension of thirty (30) days from the time the remaining defendants have been served, or thirty (30) days following the filing of plaintiff's amended complaint, whichever is greater, in which to respond to the plaintiff's anticipated amended complaint.

CHARYSH & SCHROEDER, LTD.

/s/William Michael LeCrone

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**PROOF OF SERVICE BY ELECTRONIC FILING AND U.S. MAIL**

The undersigned attorney certifies that on September 2, 2008, this motion was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record at the email addresses indicated above; this notice, and the documents referred to therein have also been served on all parties not electronically served by causing a copy of the same to be placed in the U.S. Mail at 33 North Dearborn Street, Chicago, Illinois on or before 5:00 p.m. on September 2, 2008, with proper postage prepaid.

s/ William Michael LeCrone